

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

NATASHA DELIMA,

Plaintiff,

v.

YOUTUBE, INC. ET AL.,

Defendants.

Civil No. 17-CV-733-PB

Google LLC, Twitter, Inc., and  
YouTube, LLC's Joint Motion to  
Dismiss or, in the Alternative, to  
Transfer Venue

**DEFENDANTS' JOINT MOTION TO DISMISS  
OR, IN THE ALTERNATIVE, TO TRANSFER VENUE**

Defendants Google LLC ("Google"),<sup>1</sup> Twitter, Inc. ("Twitter"), and YouTube, LLC ("YouTube")<sup>2</sup> (collectively, "Defendants") move jointly, pursuant to Federal Rule of Civil Procedure 12(b)(6), to dismiss the complaint in its entirety or, in the alternative, and pursuant to 28 U.S.C. § 1404(a), that the Court transfer the case to the United States District Court for the Northern District of California. In support of this motion, Defendants state as follows:

1. Defendants have today filed a Memorandum of Points and Authorities in Support of this Motion.
2. A proposed order is attached hereto.

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<sup>1</sup> Plaintiff named "Google, Inc." as a defendant. The entity's correct name is "Google LLC." Plaintiff also named as a defendant Blogspot.com, which is owned by Google and used with its service Blogger. As its owner, Google responds to the allegations as to Blogspot.com.

<sup>2</sup> Plaintiff named "YouTube, Inc." as a defendant. The entity's correct name is "YouTube, LLC."

WHEREFORE, Defendants respectfully request that the Court grant this motion.

Respectfully submitted,  
*Counsel for Defendants,*

May 15, 2018

/s/ Timothy J. McLaughlin  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this date, the foregoing was served by the Court's electronic filing system on all counsel and parties of record or for parties not registered with the Court's CM/ECF system by U.S. Mail.

/s/ Timothy J. McLaughlin  
Timothy J. McLaughlin